

1 A He told me that.

2 Q This was political ads of any sense?

3 A I think I told him that if we had a Federal
4 election, that my understanding was we would have to take a
5 Federal order. But this was not -- There was no Federal
6 election.

7 Q At some point this changed?

8 A That was recently, yes.

9 Q And rescinded by?

10 A By Wes.

11 Q Just to wrap this up very briefly, the ads that
12 were later sold on 97 --

13 A They were local. Yes, one was for the Sheriff,
14 and the other one was for supervisor of the town of
15 Thompson.

16 Q Between October 1994, when WJUX went on the air,
17 WXTM then, and through 1995, when local ads, other than
18 political ads sold for WJUX the station?

19 A No.

20 Q So, in fact, this rate card that we referred to
21 before was never used? Is that correct?

22 A No.

23 JUDGE STEINBERG: Are you talking about Exhibit
24 39?

25 MR. ARONOWITZ: Yes.

1 JUDGE STEINBERG: There are two rate cards.

2 MR. ARONOWITZ: Yes.

3 THE WITNESS: When you say, was never used, it was
4 used. It was never used successfully.

5 MR. ARONOWITZ: Thank you. Thank you very much.

6 BY MR. ARONOWITZ:

7 Q I am just going to ask you to hold it, because I
8 am going to come back to this in a little bit. Let me move
9 on.

10 Now, you have told us a little bit of what you do
11 at WJUX. Just to get a relation, I would like to ask you
12 some brief questions about your role as general manager of
13 WVOS.

14 In terms of general manager, are your duties as
15 general manager of WVOS, the same as your duties as general
16 manager for WJUX?

17 A No.

18 Q In what way do they differ?

19 A I have the ultimate financial authority at WVOS.
20 I sign the paychecks. I'm responsible for making sure that
21 something that doesn't go out of business. As I said, I'm
22 an officer of the company, which I'm not at Monticello
23 Mountaintop.

24 Q Other than paying the checks and the financial
25 responsibility, are your duties at WJUX and WVOS comparable?

1 A I do a lot of -- I'm not sure whether it's in my
2 role as general manager or my role as owner or my role as
3 community person. I do a lot of news coverage, and I write
4 commentaries, editorials, for WVOS, which I do not do for
5 WJUX. I do a fair amount of paper work for the FCC, as you
6 well know. I mean, I will be preparing license renewal. I
7 will be -- I do the -- With my wife, do the, you know, the
8 EEO reports and all that sort of thing.

9 So, I do not do any of that for Monticello
10 Mountaintop. Wes does all of that. So, I mean I have, not
11 only the financial responsibility, but I have the Government
12 regulatory responsibility, which, at times, can take a lot
13 of your time.

14 Q Obviously, as the licensee, you have to prepare
15 renewal applications and whatever has to be filed, as
16 presumably, Mr. Weis would for WJUX. Every licensee has an
17 obligation to do certain things. And obviously, what you
18 do, in that capacity, is for WVOS. When I say, I am talking
19 about AM and FM.

20 A Yes. Sure. It's a simulcast operation.

21 Q Simulcast operation. As a general manager,
22 managing the broadcast operations of the stations, if you
23 do, your work is essentially similar. Is that correct?

24 JUDGE STEINBERG: Did you understand the question?

25 THE WITNESS: No, I don't understand the question.

1 MR. ARONOWITZ: Let's try it another way.

2 JUDGE STEINBERG: This is a small market radio.

3 Am I right?

4 THE WITNESS: You're right.

5 JUDGE STEINBERG: In a city like New York, you
6 have a general manager. The general manager has certain
7 duties and responsibilities. Is that right?

8 THE WITNESS: Right.

9 JUDGE STEINBERG: And you have a program guy.

10 THE WITNESS: Right.

11 JUDGE STEINBERG: And you have an advertising guy.
12 In a big market, they have job descriptions, and they stick
13 to their job descriptions, and there is not much overlap.
14 Is that right?

15 THE WITNESS: You're right.

16 JUDGE STEINBERG: How is it different in a small
17 market?

18 THE WITNESS: I doubt that the general manager at
19 WCBS takes out the trash. I do.

20 JUDGE STEINBERG: You do?

21 THE WITNESS: Right. I take out the trash to the
22 dumpster. I shovel the front steps, so that nobody will
23 fall and sue me. I do whatever needs to be done. I have
24 four full time employees. And in a small market, as the
25 Judge has said, you do whatever needs to be done.

1 JUDGE STEINBERG: You do just what needs to be
2 done, regardless of what title is associated with that
3 function?

4 THE WITNESS: Absolutely.

5 JUDGE STEINBERG: What Mr. Aronowitz wants to get
6 to is, what do you do for WVOS that you do not do for WJUX?
7 And what you do for WJUX that you do not do for WVOS?

8 THE WITNESS: I understand.

9 JUDGE STEINBERG: That is the heart of it.

10 THE WITNESS: Right.

11 MR. ARONOWITZ: Your Honor, I think I can more
12 pointedly direct my questions.

13 JUDGE STEINBERG: Why don't you lead? Lead like
14 crazy.

15 MR. ARONOWITZ: Okay.

16 BY MR. ARONOWITZ:

17 Q Are you involved in the community?

18 A Yes.

19 Q You mentioned that you were involved in the
20 community, and you are involved in the community on behalf
21 of WVOS and WJUX. Is that correct?

22 A That's correct.

23 Q Is it fair to say that people in the community
24 associate you with both stations?

25 A I think that's fair to say, yes.

1 Q You are a member of the Chamber of Commerce. Is
2 that correct?

3 A Yes. I'm a member, as both WVUS and a separate
4 membership for WJUX.

5 Q Is Mr. Blabey for WVOS, or is it --

6 A I get two letters from the Chamber, one of which
7 is addressed to me, because I'm on their computer as Gene
8 Blabey, Monticello Mountaintop Broadcasting. On the other,
9 Eugene Blabey, as WVOS.

10 Q So, when you go to those meetings, you are there
11 in two capacities?

12 A Right.

13 Q Which answers the question, how can somebody be in
14 two places at once? But that is a joke. That is humor.

15 MR. RILEY: Or in one place twice.

16 MR. ARONOWITZ: Or nowhere at all.

17 THE WITNESS: Let me give you an example.

18 MR. ARONOWITZ: Please do.

19 MR. ARONOWITZ: The Chamber, every year, runs an
20 air show. It is our big tourist promotion for the summer.
21 Last summer, I went out to the airport, and for two days, I
22 stood down there at the gate selling tickets. Now, before
23 that air show, we had done promotional announcements on both
24 WVOS and WJUX. I was there at the air show, volunteering my
25 time representing, wearing both hats.

1 BY MR. ARONOWITZ:

2 Q When was this?

3 A Last July.

4 Q Okay.

5 A July 17 and 18.

6 Q You were there --

7 A Along with a lot of other people. Absolutely.

8 Q Were you in a booth?

9 A No, I was down on at the gate taking money from
10 the people as they came through with their cars.

11 Q Were you wearing identification that said you were
12 WJUX and WVOS?

13 A No. It said Sullivan County Chamber of Commerce.

14 Q Is there any community organization for which you
15 are a member or represent that you do for WJUX exclusively?

16 A No. None that I can think of.

17 Q Is there any organization in which you represent
18 WVOS exclusively?

19 A No.

20 Q Are you suggesting that there are places that you
21 represent WVOS, but that you --

22 A No.

23 Q Any membership is the same. I am trying to
24 clarify.

25 A Yes. I'm trying to think myself. I think we are

1 members --

2 Q "We", being?

3 A We, being WVOS, are a member of the New York State
4 Broadcasters Association. I have suggested to Wes that it
5 might be good to become a member. I don't think he has.
6 So, that would be an organization, where I represent WVOS,
7 but not Monticello Mountaintop.

8 Q In going back to just a little of what a general
9 manager might, do the stations often receive material as
10 suggested for promotional public service announcements?

11 A Sure.

12 Q When public service announcements come in, who
13 makes the decision where they are played on WVOS?

14 A Carol Montana.

15 Q She makes that decision solely?

16 A Generally. Not exclusively, but generally, yes.

17 Q Do you supervise those decisions, or does she make
18 them?

19 A I have been known to suggest to Carol, "You may
20 want to give prominence to this, that or the other thing
21 that I am involved with." And she normally takes my
22 suggestions. But I leave it to her. I mean, she does a
23 good job. I've got enough things to worry about.

24 Q Might she consult with you, with respect to
25 announcements with respect to WJUX?

1 A Sure.

2 Q What might you do? Send it down or not?

3 A Send it down. Send it down, or don't send it
4 down, as the case may be.

5 JUDGE STEINBERG: What do you mean by send it
6 down?

7 THE WITNESS: Carol normally faxes the public
8 service announcements down to the Network as they come in.
9 And so, when I say send it down, I'm talking about faxing it
10 down to them.

11 MR. ARONOWITZ: Forgive me. That is what I meant
12 also. We are on the same page.

13 THE WITNESS: Okay.

14 BY MR. ARONOWITZ:

15 Q When she sent down, do you know whether she made
16 recommendations or suggested that things be played, or
17 anything along those lines?

18 A No, I have no idea.

19 Q Do you do the hiring for WVOS?

20 A Yes.

21 Q Employment related activities, hiring and firing?

22 A Yes.

23 Q I think you briefly touched on some aspect of
24 this, but do you do those activities for WJUX, also? In
25 other words, do you hire and fire?

1 A Because I do not have the final monetary
2 authority -- I don't sign paychecks -- I would characterize
3 my role at JUX, as recommending people in the community to
4 Wes to put on the payroll. On the other hand, I have never
5 recommended anyone to Wes that he hasn't put on the payroll.
6 And with one exception, everyone who works for WJUX was
7 recommended by me.

8 Q And who --

9 JUDGE STEINBERG: Mr. Kirschner is the exception.

10 THE WITNESS: He was an engineer who replaced
11 Jerry Turro as the chief operator of the station.

12 BY MR. ARONOWITZ:

13 Q When you said engineer, it raised another thing.
14 And I will ask about Mr. Spicka.

15 A Yes.

16 Q Who is Mr. Spicka?

17 A George Spicka is a local engineer that I suggested
18 to Wes be hired. And George comes in -- George lives in
19 Parksville, which is about two miles away from the station.
20 So, I thought it was a good idea to have somebody, in case
21 of an emergency, that we could get right over to WJUX.
22 Kirschner lives down in New Jersey, I think.

23 So, if you're going to be off the air, and you're
24 going to have a problem, it's very helpful to have a guy who
25 has a beeper, and who is retired or semi-retired, and who is

1 available on a moment's notice. So, we hired George. And
2 George also comes in each week, checks over the equipment
3 and does and EANS test.

4 Q He is not a full time employee?

5 A No. He generally works an hour or two. But he's
6 on call. So, if he -- But he is an employee. He is not a
7 consultant. He is on the payroll. They do a W-2 for him.

8 Q When you say, comes in an hour a week, is that
9 really the EANS that you were talking about?

10 A Yeah. He checks over the equipment. And if
11 necessary, he even goes out to the transmitter. He's a
12 technical -- local, technical support person.

13 Q Just as a clarifying thing, EANS is
14 substantially --

15 A Emergency Action Notification System.

16 Q If I accidentally say EBS, we will treat the two
17 as similar for purposes of this. And if I do, I will
18 apologize.

19 A You don't have to apologize. I say EBS, too. A
20 lot of people in the business -- You forget about --

21 Q Okay. I think you mentioned Mr. Kirschner. Does
22 he work the Jukebox Network?

23 A I have no idea.

24 Q Does he work for WJUX the station?

25 A I was told he works for Wes Weis.

1 Q He works for Wes?

2 A I have no idea. I have never seen his contract of
3 engagement.

4 Q Very good. Does Mr. Spicka also work for WVOS?

5 A No. At one time, he did years ago. That's where
6 I got to know him. But he doesn't work for us now.
7 Although -- Listen, if I had a problem, I would have no
8 qualms about calling George in. If you need an engineer,
9 you need an engineer.

10 Q And he is there and accessible?

11 A Right.

12 Q Absolutely. Do you remember when he was hired?

13 A Well, I don't remember when he was hired -- an
14 exact date. But I know that I called him at the time of the
15 FCC inspection -- What was the date of that?

16 Q We will get to that.

17 A That was in May, I think, and George was sent out
18 to the transmitter to deal with that. So, he was working at
19 that time.

20 Q I will suggest to you that that was really April
21 and not May. And that is fine. I just wanted you to know.

22 I believe you said before, that Mr. Kirschner took
23 over as chief engineer from Mr. Turro. Did I understand
24 that correct?

25 A That's correct.

1 Q So, Mr. Spicka was not a chief operator or chief
2 engineer. He was just an on-call guy.

3 A He is an on-call guy. He was never the chief
4 operator of the station.

5 Q Do you remember when you first met with Mr. Weis?

6 A Yes.

7 Q Just approximately?

8 A Oh, the date?

9 Q Just approximately.

10 A I can't give you the exact date, sir.

11 Q Can I suggest to you that it was around the time
12 that Mr. Weis began the process or acquired what was then
13 WXTM?

14 A Yes. Certainly. My recollection of the first
15 visit --

16 Q I will get to that in a second.

17 JUDGE STEINBERG: Let the witness finish before
18 you ask another question. This is going to be an impossible
19 record to read with all the interruptions, and back and
20 forth and lots of pages of partial sentences. Just let him
21 finish.

22 THE WITNESS: My recollection is that Wes came to
23 my office and said that he was acquiring the construction
24 permit from Larry Fishman, the previous permittee of WXTM.
25 And the first discussion revolved around whether or not he

1 could assume the tower lease that I had previously
2 negotiated with Fishman. That must have been prior to --
3 obviously, was prior to the date they went on the air,
4 because we did work out an assumption, and we did work out
5 the studio lease and those various things. But exact date,
6 I do not know.

7 BY MR. ARONOWITZ:

8 Q Do you remember when you first met Mr. Turro?

9 A Yes. I think he accompanied Wes Weis on that
10 first visit.

11 Q So, he was with Mr. Weis at the time you just
12 referred when Mr. Weis was interested in assuming Mr.
13 Fishman's lease. Is that correct?

14 A He was introduced to me as Wes's chief engineer.

15 Q Mr. Fishman, the previous permittee of WXTM, had
16 negotiated a transmitter lease, and that is what Mr. Weis --

17 A An antenna lease.

18 Q An antenna lease. Had Mr. Fishman negotiated a
19 lease for studio space with you?

20 A No.

21 Q When Mr. Weis sought to assume Mr. Fishman's lease
22 for the antenna, did the topic of leasing the main studio
23 come up?

24 A At the first meeting? I cannot say. There were a
25 couple of meetings, and I can't say whether it came up at

1 the first meeting. It came up at one of the meetings that
2 we had, because, obviously, we negotiated a lease.

3 Q So, this is still that October 1994 time frame?

4 A I can't say it was October '94.

5 Q About that time. I apologize. When I said
6 October 1994, I am attaching the significance that that is
7 the start-up time. But it is probably before WJUX went on
8 the air?

9 A Certainly. Certainly.

10 Q Who first suggested the use of WVOB building as
11 the main studio for WJUX? Was it you or Mr. Weis?

12 A I don't recall.

13 Q I am assuming that a successful lease was drafted?

14 A Yes.

15 Q And that is separate from the antenna lease. Is
16 that correct?

17 A Yes.

18 Q Okay. Was Mr. Turro present during any of these
19 negotiations?

20 A Yes.

21 Q And at what point did the discussion arise, with
22 respect to you taking on the general manager duties at WJUX?

23 A In the context of one of those earlier
24 discussions. And I suspect, although I can't say for sure,
25 that it was when we were talking about the lease of studio

1 space. My consideration, frankly, at the time was, and
2 continues to be, if I'm going to be in this close contact
3 with another radio station, I want to be involved just for
4 my own purposes. For my own purposes, I want to be
5 involved.

6 Because it didn't seem to me a very good way to
7 have other people in such close -- This is a small studio.
8 And in a small office that you don't know or don't have
9 confidence in, living in the same room with your people. I
10 didn't want to have that happen. So, I may well have
11 suggested that. I can't say for sure. But I may well have
12 suggested that I would take the general managership.

13 Q When you say suggested, that was not a condition?

14 A No.

15 Q But it was a suggestion that you made?

16 A As I think of it, I probably would have had
17 reservations if he'd said, "I want to bring somebody else
18 in," for those very reasons. I mean, I'm not -- would not
19 be happy about having somebody from outside come in, in that
20 close relationship between the two stations. I'm much
21 happier if it's me or somebody that works for me that I
22 trust and have confidence in.

23 JUDGE STEINBERG: There are not two separate
24 entrances?

25 THE WITNESS: What?

1 JUDGE STEINBERG: There are not two separate
2 entrances?

3 THE WITNESS: No. There are not two separate
4 entrances or two separate offices and reception center.
5 It's a very small building. If you're going to get married
6 to somebody, you want to make sure that they're compatible.

7 BY MR. ARONOWITZ:

8 Q Prior to the discussion between you and Mr. Weis
9 with respect to a general manager, did Mr. Weis indicate to
10 you any tentative plans he might have to staff WJUX, if any?

11 A I don't recall. I don't think so, but I don't
12 recall.

13 Q I would like to bring up to you, and I am putting
14 before Mr. Blabey a copy of the deposition taken on what
15 appears to be July 1, Pages 1 through 112, Deposition of
16 Eugene H. Blabey. I am assuming everybody has a copy, but I
17 will just put it in front of Mr. Blabey.

18 Actually, for purposes of this question, ask you
19 to turn to Page 24, Line 21, and read to yourself from Line
20 21 down to Line 14 of the next page.

21 A Okay.

22 Q Having read that, does that refresh your memory
23 with respect to any discussions you might have had prior to
24 any decision to hire you as general manager?

25 A Yes.

1 Q What is your refreshed recollection?

2 A About what?

3 Q About whether you had any discussions prior to the
4 decision to retain you as general manager of WJUX?

5 MR. RILEY: I object, Your Honor. He has
6 testified at length to the discussions that were had prior
7 to his being retained.

8 MR. ARONOWITZ: He just said --

9 THE WITNESS: I don't see anything in here that
10 differs than what I just said.

11 MR. ARONOWITZ: Okay.

12 JUDGE STEINBERG: You do not have to read what you
13 said.

14 MR. ARONOWITZ: Well --

15 JUDGE STEINBERG: In the deposition, he basically
16 says, he cannot remember whether he was asked or whether he
17 volunteered. That is what he said today.

18 MR. ARONOWITZ: I was more concerned and --

19 JUDGE STEINBERG: Was your concern with something
20 else?

21 MR. ARONOWITZ: Well, what I would do is I would
22 start at Page 24. I am going to read the following and ask
23 you if this is what you said.

24 JUDGE STEINBERG: I do not think we need to read
25 the following, and ask if this is what he said.

1 MR. ARONOWITZ: Okay.

2 JUDGE STEINBERG: Is this impeachment?

3 MR. ARONOWITZ: Well --

4 JUDGE STEINBERG: If it is impeachment, you can do
5 it. If it is refreshed recollection, just show him. Give
6 me the specific thing that you want.

7 MR. ARONOWITZ: I am trying --

8 JUDGE STEINBERG: Why don't just ask the question,
9 and see if you get a different answer?

10 BY MR. ARONOWITZ:

11 Q Did you have several meetings with Mr. Weis
12 concerning your taking the general manager's role or any
13 role in the station?

14 A Yes.

15 Q During one of those meetings, did a question come
16 up in relation to another station in Liberty, which operates
17 from a telephone answering service? In other words, that
18 station is automated.

19 A Yes. As a matter of fact, I discussed the
20 operation of WPDA, which is actually licensed to
21 Jeffersonville, which is automated and operates out of a
22 telephone answering service in Liberty. And that is the
23 place where the public file is located. And we discussed
24 WPDA. Absolutely.

25 Q Is it fair to say, to your knowledge, that Mr.

1 Weis was intrigued and interested in the idea?

2 A Yes.

3 JUDGE STEINBERG: We did not have to read.

4 BY MR. ARONOWITZ:

5 Q Mr. Blabey, you just testified that you wanted to
6 be in your facility. Is it also true that it would also
7 work for you, because you were already doing a lot of these
8 general manager functions, answering the phone, seeing
9 people and so on?

10 A Yes.

11 Q Would it become overly burdensome to you?

12 A No.

13 Q So, that also contributed to your decision?

14 JUDGE STEINBERG: Did you have an answer to that
15 one, the not being overly burdensome contributed to your
16 decision?

17 THE WITNESS: Yes. I said yes.

18 JUDGE STEINBERG: I did not hear it. I saw you
19 nod.

20 THE WITNESS: Okay. I apologize.

21 JUDGE STEINBERG: Nodding does not --

22 THE WITNESS: Show on the record. Right.

23 BY MR. ARONOWITZ:

24 Q So you ultimately reached an agreement to become
25 the general manager of WJUX. Is that true?

1 A Yes.

2 Q When WJUX ultimately signed on, you were the
3 general manager?

4 A Yes.

5 Q Was it your understanding that your agreement with
6 Mr. Weis, among other things, called for you to be at the
7 station during normal business hours?

8 A Yes.

9 Q You were doing that anyway for WVOS?

10 A Yes.

11 Q When I say that, I am accepting the fact that it
12 was not 24 hours a day. Some days you would have to be out
13 in the community and out and about. And, as general
14 manager, that would be done. I am not looking to have you
15 change your desk.

16 A Let me amplify by saying that that agreement,
17 which you have a copy of, says that I will available to him
18 during normal business hours. I don't think it says that I
19 will be at the station during normal business hours.

20 Q I think you testified before that you had an
21 agreement with Mr. Weis, with respect to a commission on ad
22 sales.

23 A Yes.

24 Q In addition to your general manager duties.

25 A That followed. That came later. I can't give you

1 a date, but I think you have a copy of it.

2 Q And that agreement was strictly for ads sales for
3 WJUX, the radio station. Is that correct?

4 A That's correct.

5 Q And if someone wanted to buy an ad on Jukebox
6 Radio Network, they would not go to you to buy that ad. Is
7 that correct?

8 A No. I have no right to sell time for Jukebox
9 Radio Network.

10 Q So, if somebody went to Jukebox Radio, you would
11 not be entitled to your commission?

12 A No. I wouldn't be involved.

13 Q Just for context again, how many employees
14 generally are there at WVOS?

15 A During normal business hours? Okay. I'll give
16 you -- During normal business hours, there would be anywhere
17 from one, two, three or four. After 8:00 at night, WVOS is
18 automated, and there's no one there, until 5:30 the next
19 morning. So, generally, there is always at least one person
20 during normal business hours. Generally, there are three or
21 even four, depending on the time of day and demands. That
22 sort of thing.

23 Q And is Carol Montana one of your employees? Yours
24 being WVOS's?

25 A Yes.

1 Q And I believe you have referred to her at least
2 once, as the glue that holds the operation together?

3 A Yes. Carol's a very competent individual.

4 Q Is she the officer manager?

5 A She's the office manager for WVOS. Yes.

6 Q Does she have any financial responsibilities?

7 A She's the bookkeeper.

8 Q Does she sell ads?

9 A Yes.

10 Q Does she participate in any programming?

11 A Yes. And she, on occasion, takes out the trash.

12 Q Sounds like you work for her.

13 A Sometimes I feel that way.

14 Q But, in fact, you supervise all WVOS employees?

15 A Yes.

16 Q And you also supervise Ms. Montana's work for
17 WVOS?

18 A For WVOS?

19 Q For WVOS.

20 A Yes.

21 Q Do you supervise any of the work for WJUX?

22 A Yes.

23 Q Is it safe to say that she consults with you on
24 WJUX materials?

25 A Yes.

1 Q Ms. Montana is fairly busy on any given day
2 between WVOX and WJUX activities. Is that safe to assume?

3 A When you have four employees running a full
4 service radio station, everyone is busy.

5 Q Including yourself?

6 A Absolutely.

7 Q In fact, besides the owner of the licensee, the
8 general manager and civic activist, if you will, and I mean
9 that in the best possible sense, for WVOX, are you also a
10 reporter?

11 A Yes.

12 Q And you mentioned you do ad sales?

13 A Yes.

14 Q Do you do any production, generally?

15 A No, I don't. I stay away from that.

16 Q Was WVOX do remote live broadcasts?

17 A Yes.

18 Q Do you attend those?

19 A Sure. Not all of them, but many of them.

20 Q Do you also appear on the air?

21 A I do an editorial commentary, which I write and
22 voice. I did the election night coverage from the Board of
23 Elections. I try to stay off the air except in the role of
24 station owner or commentator. It does not -- But I do news
25 reports. Where it's necessary, I will get on the phone and

1 do a news report. I try to limit my exposure on the air.

2 Q Thus far, we have been talking about WVOS. Do you
3 have any of these functions for WJUX?

4 A What functions?

5 Q Are you a reporter?

6 A I have never personally sent news stories to JUX,
7 although, on occasion, the Network has called my own news
8 director or his assistant, and asked for a fax of a story of
9 something that we have, to be sent down. For example, on
10 election night, they got, I think, some of their results
11 from WVOS. So, there is some interplay on the news level.
12 But I have not personally ever made a report for WJUX.

13 Q And we talked about ads, and we talked about
14 general news. Do you do editorials for the Network?

15 A No.

16 Q In your role at WVOS, do you participate in the
17 production, such as contributing ideas or your expertise to
18 public affairs programming that appears on WVOS?

19 A Yes.

20 Q Such as interviewing a community leader, for
21 example?

22 A Yes.

23 Q And WVOS presents public affairs programming?

24 A Yes.

25 Q You are aware of WVOS programming?